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ABSTRACT

Since its inception in 1965, Head Start has actively promoted using volunteers and community resources to expand and improve program operations. This document is a collection of policies regarding the use of volunteers and community resources for the benefit of Head Start children and families. It is designed for use by program managers, volunteer coordinators, other Head Start staff, and Policy Council members. The document is organized into 13 sections, each presenting an aspect of volunteer management in the Head Start program. Each section begins with a short commentary, followed by several subsections. Each subsection presents the relevant policy references on the left side of the page, and on the opposite page cites the text from that document. The sections are: (1) "Authority for the Volunteer Program"; (2) "Recruitment of Volunteers"; (3) "Head Start Parents as Volunteers"; (4) "Screening Volunteers"; (5) "Orientation/Training of Volunteers"; (6) "Volunteers in the Education Services Component"; (7) "Volunteers in the Health Services Component"; (8) "Volunteers in the Social Services Component"; (9) "Liability Coverage of Volunteers"; (10) "Allowable Costs Incurred by Volunteers"; (11) "Allowable Volunteer Services for Matching Requirements"; (12) "Valuation of Volunteer Services"; and (13) "Documentation of Volunteer Services." (KDFB)

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HEAD START
Volunteer Policies

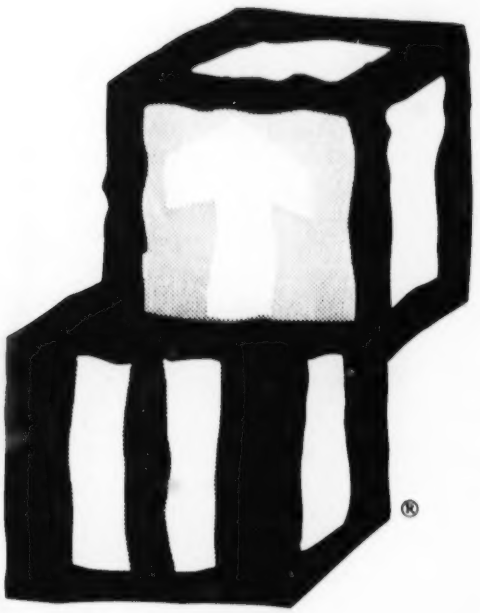

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TABLE OF CONTENTS

1. AUTHORITY FOR THE VOLUNTEER PROGRAM 1
   - 1.1 Commitment of Management 2
   - 1.2 Coordinator of Volunteers 3
   - 1.3 Duties and Qualifications of a Coordinator of Volunteers 3
   - 1.4 Development of a Plan for Volunteer Services 4

2. RECRUITMENT OF VOLUNTEERS 4
   - 2.1 Responsibility for Recruitment of Volunteers 5
   - 2.2 Role of the Policy Council/Committee in Recruitment of Volunteers 5
   - 2.3 Mobilization of Community Resources 6

3. HEAD START PARENTS AS VOLUNTEERS 6
   - 3.1 Parents as Members of Decisionmaking Groups 7
   - 3.2 Parents as Program Volunteers 7
   - 3.3 Parent Participation Is Voluntary 8

4. SCREENING VOLUNTEERS 8
   - 4.1 Placing Volunteers 8
   - 4.2 Screening Volunteers to Help Safeguard Children from Disease 9
   - 4.3 Screening Volunteers to Help Safeguard Children from Child Abuse and Neglect 9

5. ORIENTATION/TRAINING OF VOLUNTEERS 11
   - 5.1 Written Agreements with Volunteers 11
   - 5.2 Training for Volunteers 11
   - 5.3 Including Volunteers in the Training Plan for Each Program Option 12
   - 5.4 Volunteer Positions as the First Step on the Career Ladder 13
   - 5.5 Training to Be a Volunteer Enhances Personal Growth and Development 13

6. VOLUNTEERS IN THE EDUCATION SERVICES COMPONENT 14
   - 6.1 Volunteers in the Classroom 14
   - 6.2 Volunteers in Home-Based Programs 15
   - 6.3 Volunteers as a Resource in Meeting the Special Needs of Children 15
     - 6.3.1 Parents as Multicultural Curriculum Resources 15
     - 6.3.2 Bilingual Volunteers 16
     - 6.3.3 Serving Handicapped Children 17

7. VOLUNTEERS IN THE HEALTH SERVICES COMPONENT 18
   - 7.1 Health Services Advisory Committee (HSAC) 18
   - 7.2 Volunteers and Health Services 19
   - 7.3 Protection of Confidentiality of Children's Health Records 21

8. VOLUNTEERS IN THE SOCIAL SERVICES COMPONENT 22
   - 8.1 Social Services Advisory Committee 22
   - 8.2 Volunteers and Client Confidentiality 23
   - 8.3 Protection of Confidentiality of Family's Social Service Records 23
   - 8.4 Parent Volunteers in Social Services 24

9. LIABILITY COVERAGE OF VOLUNTEERS 24

10. ALLOWABLE COSTS INCURRED BY VOLUNTEERS 26

11. ALLOWABLE VOLUNTEER SERVICES FOR MATCHING REQUIREMENTS 27
11.1 Cost Sharing or Matching 27
11.2 Services Provided Within Grant Period 28
11.3 Services Provided from Outside Agency (Accounting Technicality) 29
11.4 Services as an Indirect Cost 29

12. VALUATION OF VOLUNTEER SERVICES 30
12.1 Establishment of Wage Comparability Rates 30
12.2 Services from Employees of Another Employer 31
12.3 Services by Volunteer Decisionmakers 31

13. DOCUMENTATION OF VOLUNTEER SERVICES 32

HEAD START POLICIES
VOLUNTEERS AND COMMUNITY RESOURCES

From its inception in 1965, Head Start has actively promoted using volunteers and community resources to expand and improve program operations for the benefit of Head Start children and families. The importance of using these resources has been formally recognized in different Federal policies, such as those requiring programs to:

- Ensure that the third person in the classroom is a volunteer
- Have volunteers participate to the fullest extent possible in all program operations
- Calculate the value of volunteer time as part of the non-Federal match for Federal monies
- Use community resources to provide services to children before spending Federal funds

Throughout Head Start's history, policies regarding the use of volunteers have been incorporated in various documents affecting program administration, operations, and evaluation. Now, for the first time, these policies are available in one document for use by program managers, volunteer coordinators, other Head Start staff, and Policy Council members. CSR, Incorporated conducted this task under its grant to operate the Region V Head Start Training and Technical Assistance Resource Center. This undertaking reflects the commitment of the National Head Start Bureau to improve the quality of Head Start programs through the use of volunteers and public/private agency partnerships.

This document is organized into 13 separate sections, each presenting an aspect of volunteer management in the Head Start program. Each section begins with a short commentary, followed by various subsections. Each subsection presents the relevant policy reference(s) on the left side of the page and, opposite that, cites the text from that document. The citations are intended to be sufficiently detailed that reference to the original document is *not* required.

This collection of existing policy does not attempt to interpret or offer suggestions for implementation. Such information is provided in the concurrently published "A Handbook for Volunteer Coordinators in Head Start." The handbook has been prepared to assist programs in (a) developing well-organized and active volunteer programs that will increase opportunities for children and their families; (b) creating a positive image of Head Start within the community; and (c) conforming to Head Start Performance Standards and maintaining high-quality programs.

1. AUTHORITY FOR THE VOLUNTEER PROGRAM

Project Head Start was founded on the belief that successful programs demand meaningful citizen participation. To achieve such participation, the program was designed to require using volunteers and, in turn, to allow their services to be counted as in-kind contributions toward the non-Federal share of the local Head Start budget.

Several documents have been prepared and disseminated to all grantees authorizing and guiding them in establishing volunteer programs. (*Note*: All of the documents listed

below may be reproduced. Those documents identified as "out of print" are no longer available for distribution by the Head Start Bureau. *The relevant information from all these documents has been compiled in this publication so that reference to the originals is not needed.*)

"Head Start Child Development Programs: A Manual of Policies and Instructions" (manual 6108-1), issued in 1967, contains a section on volunteers. "Volunteers" (pamphlet number 5 of the Head Start Rainbow series), published in 1968, offers guidance for the volunteer component. (*Both of these documents are out of print and not available from the National Head Start Bureau.*)

The official "Head Start Program Performance Standards" have been in use since 1975. Although the performance standards do not identify a separate volunteer component, they include requirements specific to volunteers in both the policy and guidance sections.

The continued emphasis on volunteer services was restated by the Office of Human Development Services (HDS) in the 1982 Information Memorandum on volunteerism (HDS-IM-82-1). The memorandum addressed the need not only for a volunteer effort in each Head Start program but also the need for commitment of both program and personnel resources to effectively implement a volunteer program. (*This Information Memorandum is out of print.*)

A Notice of Proposed Rulemaking, 45-CFR Part 1306, entitled "Head Start Staff Requirements and Program Options," was published in the *Federal Register* for comments on December 8, 1988, and circulated to Head Start programs through the issuance of an Information Memorandum dated December 14, 1988 from the Administration for Children, Youth and Families (ACYF-IM-88-34). This proposed regulation would require Head Start programs to use volunteers to the fullest extent possible and to develop and implement a system to actively recruit, train, and utilize volunteers in the program. In addition, it would require special efforts to have volunteer participation, especially from parents, in the classroom.

"Revised Instructions for Completion of a Head Start Grant Application" were published in the *Federal Register*, December 28, 1988, and circulated to Head Start programs through the issuance of an Information Memorandum dated January 3, 1989 (ACYF-IM-89-01). These proposed instructions would require programs to stipulate how "volunteer supervision and training opportunities" are accomplished as a requirement for obtaining a grant.

Through these regulations, policies, grant requirements, and guidance, local Head Start programs are required to develop high-quality volunteer programs as part of their overall planning activities. These issuances address several factors key to the development of a successful volunteer effort.

1.1 *Commitment of Management*

To be effective, a volunteer program must have the commitment of management. Head Start management includes the agency board of directors, Policy Council/Committee members, the director, and component coordinators. In addition, staff who directly supervise volunteers (e.g., cooks, bus drivers, classroom staff) must share in the commitment if the program is to function effectively.

REFERENCE	TEXT CITATION
"HDS Position Statement on Volunteerism." HDS-IM-82-1, Office of Human Development Services, July 26, 1982.	Commitment of Management: In order to be successful, HDS volunteer programs must have the strong commitment of management at all levels, from the highest executive to the lowest supervisor and staff. While volunteers are not without cost, they can and should be extremely cost-effective.... Commitment of top management to volunteerism implies a willingness, when necessary, to budget funds for the operation of the program....

1.2 *Coordinator of Volunteers*

Responsibility for the overall direction and supervision of the volunteer component is assigned to the Coordinator of Volunteers.

REFERENCE	TEXT CITATION
"Head Start Child Development Programs: A Manual of Policies and Instructions." Manual 6108-1, Office of Child Development, September 1967.	3. The Staff f. The Volunteers Every Head Start program must use volunteers to the fullest extent possible. Volunteers may be either professionals or non-professionals. (1) Every program should have a Coordinator of Volunteers. A full-time Coordinator will be needed for the larger programs. The small programs should combine this assignment with another position such as the Parent Coordinator. In some cases the Coordinator of Community Resources for the Community Action Agency might also serve as the supervisor of the Head Start volunteers. Hopefully, some communities will be able to locate a qualified volunteer for this assignment.

1.3 *Duties and Qualifications of a Coordinator of Volunteers*

The policy cited below addresses the general duties and qualifications of the Coordinator of Volunteers. Programs should review performance standards and component plans to develop an appropriate job description for the Coordinator.

REFERENCE	TEXT CITATION
"Head Start Child Development Programs: A Manual of Policies and Instructions." Manual 6108-1, Office of Child Development, September 1967.	3. The Staff a. Employment of Qualified Personnel (5) Staff Qualifications and Duties Coordinator of Volunteers Duties—Responsible for the recruitment of volunteers. Coordinates and supervises the volunteer program. Provides liaison with volunteer bureaus and other private agencies who specialize in volunteer services. Qualifications—The Volunteer Coordinator may be a paid or volunteer person. Must be a sound administrator who is able to structure the volunteer program carefully, so that the services rendered by volunteers are compatible with their capabilities, oriented to the needs of the staff and participants, and consistently available to fill the position assigned to them.

1.4 *Development of a Plan for Volunteer Services*

While there is no specific mention of a Plan for Volunteer Services in the performance standards or other policy issuances, there are references to the recruitment, training, and appropriate use of volunteers. In addition, as mentioned earlier, the proposed grant application would require programs to discuss how they will "supervise and train volunteers." Therefore, another responsibility of the individual overseeing volunteer services is to work with other staff, board and Policy Council/Committee members, and community representatives in the development of a Plan for Volunteer Services. The plan should encompass the requirements listed in various sections of the performance standards.

2. RECRUITMENT OF VOLUNTEERS

The Plan for Volunteer Services should include procedures for recruiting and screening volunteers. It should identify responsibilities not only of the Coordinator of Volunteers but of other Head Start staff and policy groups. Development of an inventory of the kinds of volunteer assistance the program could use will involve cross component planning and facilitate recruitment of volunteers for specific tasks.

Volunteers can be professionals and nonprofessionals; parents, local residents, and members of the larger community; those who give a few hours time and those who volunteer every week; board members and those who serve on policy and advisory groups; those who work in classrooms, or offices, or kitchens; those who provide necessary health education, medical and dental examinations, and other health services.

2.1 *Responsibility for Recruitment of Volunteers*

The major responsibility for the recruitment of volunteers is assigned to the Coordinator of Volunteers. The Coordinator must develop a multifaceted approach to recruitment, which may include a committee assigned the task of developing recruiting strategies and targeting volunteer resources.

REFERENCE	TEXT CITATION
"Head Start Child Development Programs: A Manual of Policies and Instructions." Manual 6108-1, Office of Child Development, September 1967.	3. The Staff f. The Volunteers The Coordinator of Volunteers should be responsible for their recruitment and the administration of their services. The recruitment is not always easy. They should be sought both within and outside the target neighborhood. Volunteer bureaus and other agencies which specialize in volunteers should be approached for help. The need should also be publicized through parents of the children, church groups.... Perhaps a committee to recruit volunteers could be established.

2.2 *Role of the Policy Council/Committee in Recruitment of Volunteers*

In addition to volunteering in the program, Head Start parents and other Policy Council or Policy Committee members shall assist in the recruitment of volunteers from the community and the parent group. The role of these policy groups should be included in the Plan for Volunteer Services. It is worth noting that the members of Policy Councils and Policy Committees are themselves volunteers.

REFERENCE	TEXT CITATION
"Head Start Program Performance Standards." 45-CFR 1304, Appendix B—Head Start 1-30-2, The Parents, November 1984.	B. The Role of the Parents 1.c(2) The Head Start Policy Committee ...the Committee shall: (e) Aid in recruiting volunteer services from parents, community residents, and community organizations, and assist in the mobilization of community resources to meet identified needs. *(continued)*

REFERENCE	TEXT CITATION
	1.c(3) The Head Start Policy Council ...the Council shall: (e) Recruit volunteer services from parents, community residents and community organizations, and mobilize community resources to meet identified needs.

2.3 *Mobilization of Community Resources*

Head Start policies have always encouraged the active recruitment of parents, non-Head Start professional staff, and community agencies to supplement existing program resources.

REFERENCE	TEXT CITATION
"Head Start Child Development Programs: A Manual of Policies and Instructions." Manual 6108-1, Office of Child Development, September 1967.	4. The Community a. Mobilizing Community Resources Mobilization of community resources involves more than agencies and groups. Individuals count heavily as a community resource. An early childhood specialist...a qualified social worker...a pediatrician or dentist...a journalist, lawyer, banker, advertising man, parent—each has a contribution to make to the program, either with...specialized skill or as a liaison with other sections of the community.... These people can often contribute to parent involvement activities as well as to staff in-service training programs.
"HDS Position Statement on Volunteerism." HDS-IM-82-1, Office of Human Development Services, July 26, 1982.	Recruitment and Use of Volunteers: Volunteers can be recruited from all socio-economic groups within the community, including representatives of client groups, civic, fraternal, or religious organizations, and other community groups.

3. HEAD START PARENTS AS VOLUNTEERS

Head Start parents constitute a special set of potential volunteers. There are four kinds of parent participation listed in "70.2: The Parents." While two involve parent-sponsored activities in the program and parents working with their children at home, the

other two focus on the important role of parents as volunteers. The first addresses parent participation in the decisionmaking process and includes membership on Policy Councils, advisory groups, program evaluation teams, and the like. The second addresses participation in the classroom or other program activities as a volunteer.

3.1 *Parents as Members of Decisionmaking Groups*

Parents have a central role in the operations of the Head Start program as members of the Policy Council/Committee. They also serve on a variety of other advisory groups affecting program direction and quality.

REFERENCE	TEXT CITATION
"Head Start Program Performance Standards." 45-CFR 1304, Appendix B—Head Start I-30-2, The Parents, November 1984.	B. The Role of the Parents Every Head Start program must have effective parent participation. There are at least four major kinds of parent participation in local Head Start programs. 1. Participation in the process of making decisions about the nature and operation of the program.
"Head Start Program Performance Standards." 45-CFR 1304, Parent Involvement, Subpart E—Parent Involvement Objectives and Performance Standards, November 1984. 1304.5-1 Parent involvement objectives	(c) Provide the following kinds of opportunities for parent participation: (1) Direct involvement in decision making in the program planning and operations.

3.2 *Parents as Program Volunteers*

Parents are encouraged to volunteer in the classroom and in other program components. In their capacity as volunteers, parents learn more about child development and their role as the primary educator of their children. Parents also are able to obtain experiences helpful for future employment.

REFERENCE	TEXT CITATION
"Head Start Program Performance Standards." 45-CFR 1304, Appendix B—Head Start I-30-2, The Parents, November 1984.	B. The Role of the Parents Every Head Start program must have effective parent participation. There are at least four major kinds of parent participation in local Head Start programs. *(continued)*

REFERENCE	TEXT CITATION
	2. Participation in the classroom as paid employees, volunteers, or observers. Participation as volunteers may also be possible for many parents. Experience obtained as a volunteer may be helpful in qualifying for non-professional employment.
"Head Start Program Performance Standards." 45-CRF 1304, Parent Involvement, Subpart E—Parent Involvement Objectives and Performance Standards, November 1984. 1304.5-1 Parent involvement objectives	(2) Participation in classroom and other program activities as paid employees, volunteers, and observers.

3.3 *Parent Participation Is Voluntary*

While participation of parents must be actively sought and supported, Head Start policy requires that this be voluntary and forbids making it a condition for a child's enrollment.

REFERENCE	TEXT CITATION
"Head Start Program Performance Standards." 45-CFR 1304, Parent Involvement, Subpart E—Parent Involvement Objectives and Performance Standards, November 1984. 1304.5-2 Parent involvement plan content: parent participation	(b) The plan shall assure that participation of Head Start parents is voluntary and shall not be required as a condition of the child's enrollment.

4. SCREENING VOLUNTEERS

Screening volunteers is closely related to recruitment and to the service a volunteer will provide. Selection criteria for volunteers need to be established for each category of volunteer positions.

4.1 *Placing Volunteers*

Volunteers may fill many functions in the program, including serving as the third person in the classroom, assisting in meal preparation, providing health education or services, typing or word processing, or assisting with budget preparation or long-range planning activities. It is important to define volunteer positions and to screen applicants accordingly.

REFERENCE	TEXT CITATION
"HDS Position Statement on Volunteerism." HDS-IM-82-1, Office of Human Development Services, July 26, 1982.	Recruitment and Use of Volunteers: Volunteers may be used in any area of program administration or service delivery in which they have appropriate training and skills. This is true for all programs receiving Federal funds from or through the Office of Human Development Services.

4.2 *Screening Volunteers to Help Safeguard Children from Disease*

Volunteers who are in contact with children are, like staff in similar positions, subject to health screenings for communicable diseases. Agencies should check individual State regulations regarding health screenings. State requirements may mandate additional screening or tests, depending on local conditions. In most States, volunteers who assist with food preparation must meet the same health clearance standards as other food service staff.

REFERENCE	TEXT CITATION
"Head Start Program Performance Standards." 45-CFR 1304, Health, Subpart C—Health Services Objectives and Performance Standards, November 1984. 1304.3-3 Medical and dental history, screening, and examinations	(d) The plan shall provide, also, in accordance with local and State health regulations that employed program staff have initial health examinations, periodic check-ups, and are found to be free from communicable disease; and that volunteer staff be screened for tuberculosis. *Related* Performance Standards *Guidance* (d) Staff and volunteers with respiratory infections, skin infections, or other types of communicable diseases should not have contact with the children. Depending on conditions in the community, tuberculin testing, miniature chest X-rays, or full-size chest films may be the most economical forms of screening. Tuberculin screening is not necessary for the *occasional* volunteer.

4.3 *Screening Volunteers to Help Safeguard Children from Child Abuse and Neglect*

In 1988, ACYF/OHDS issued revised regulations on screening potential Head Start employees for prior offenses of child abuse and neglect. Head Start agencies must revise their personnel policies in accordance with Final Rule 45-CFR 1301.31 and applicable State and local laws.

The rule itself does not specify its applicability to volunteers. However, as a consequence of comments received about the proposed rule, OHDS decided to give grantees the responsibility for extending these requirements for new employees to current staff and volunteers. Appropriate program management may dictate that regulations pertaining to new staff also pertain to new volunteers. Individual States may have established more specific regulations in regard to volunteers, and programs should check State laws for additional requirements. Grantees should be aware that Federal law supercedes State law where Federal monies are concerned and should therefore minimally meet Federal standards.

The reference below includes an excerpt from the discussion of the final rule, followed by selections from the rule itself.

REFERENCE	TEXT CITATION
"Final Rule on Head Start Program Personnel Policies on Staff Recruitment and Selection." 45-CFR 1301, Subpart D, *Federal Register*, Vol. 53, No. 39, February 29, 1988. Supplementary Information: III. Provisions of the Final Rule, Section 1301.31(c) Discussion	... Some commenters proposed that current staff and volunteers be included in [the requirement to sign the declaration] and others suggested they be excluded. The OHDS will allow each grantee to determine whether current staff and volunteers must sign the declaration required of new employees by this rule.
1301.31 Personnel policies	(a) Head Start agencies must establish and implement personnel policies for themselves and their delegate agencies.... (c) The policies must require that all prospective employees must sign a declaration prior to employment which lists: (1) All pending and prior criminal arrests and charges related to child sexual abuse and their disposition; (2) Convictions related to other forms of child abuse and/or neglect; and (3) All convictions of violent felonies. (e) The policies governing recruitment and selection of staff must require that before an employee is hired for a probationary period, the grantee or delegate agency will have conducted: (1) An interview of the applicant, and (2) A check of personal and employment references.... (*continued*)

REFERENCE	TEXT CITATION
	(g) (1) ...before staff are hired on a permanent basis, the grantee or delegate agency will have conducted a State and/or national criminal check if required by State law and/or administrative requirement.

5. ORIENTATION/TRAINING OF VOLUNTEERS

Volunteers, once selected, need to know what their responsibilities will be, what agency regulations apply to them, who their agency contact will be, and who (if anyone) will be supervising them. Even those volunteers who provide a short-term professional service (for example, a parent training session) will require a briefing and an understanding, preferably written, of the mutual relationship. In addition, volunteers should be familiar with the performance standards for the component in which they serve. The Plan for Volunteer Services should include procedures for orientation, training, and supervision of each kind of volunteer.

5.1 *Written Agreements with Volunteers*

Appropriate management practice dictates that the specific schedules, work arrangements, and duties of each volunteer be put in writing. The signatures of the volunteer and program staff person on the document show that its terms are understood and agreed to. This document is the basis not only for resolving problems that may arise during the time the agreement is in effect but also for evaluating the volunteer's accomplishments.

REFERENCE	TEXT CITATION
"HDS Position Statement on Volunteerism." HDS-IM-82-1, Office of Human Development Services, July 26, 1982.	Status of Volunteers: It is beneficial to have written agreements with each volunteer specifying their duties, number of hours per week or month, and a specific termination date. New agreements may then be initiated with the same volunteers if mutually desirable. Ongoing evaluation is an important ingredient of a good volunteer program. Volunteers should be evaluated regularly to measure accomplishments and effectiveness of the program.

5.2 *Training for Volunteers*

Program policies and practice are to treat volunteers the same as staff. Volunteers should receive orientation and training comparable to what the staff receive.

REFERENCE	TEXT CITATION
"HDS Position Statement on Volunteerism." HDS-IM-82-1, Office of Human Development Services, July 26, 1982.	Status of Volunteers: People who volunteer their time and skills in an organized program should be afforded equal treatment with agency staff so far as program guidelines and policies are concerned. They should receive comparable orientation, on-the-job training, supervision, etc.
"Head Start Child Development Programs: A Manual of Policies and Instructions." Manual 6108-1, Office of Child Development, September 1967.	3. The Staff f. The Volunteers ... All volunteers should be apprised of their duties and responsibilities before beginning the job. They must know lines of authority and basic regulations pertaining to themselves and the children. And expectations for the quality of their services should be the same as for all other members of the staff. Volunteers make a commitment to Head Start when they offer their services and should be made to feel an integral part of the program with a responsibility to it. Training must be provided for them, and they should be included in regular meetings of the paid staff whenever possible.

5.3 *Including Volunteers in the Training Plan for Each Program Option*

Head Start has supported the development of options that best fit the needs of the community. Federal regulations are quite clear that volunteers, as well as staff, receive training specific to the requirements and goals of each option regardless of the program option (or options) selected.

REFERENCE	TEXT CITATION
"Head Start Program Performance Standards." 45-CFR 1304, Appendix A—Program Options for Project Head Start, N-30-334, November 1984.	A. General Provisions ... Any program option proposed must demonstrate that it meets...the following conditions: 7. There must be a specific training plan for staff and volunteers for any option (*continued*)

REFERENCE	TEXT CITATION
	chosen. It should address itself to the requirements and goals of the specific program variations being implemented. B. Special Provisions 4. Home-Based Models h. Staff Development Programs must submit a staff and volunteer recruitment plan and a training plan, including content of proposed pre- and in-service training programs....

5.4 *Volunteer Positions as the First Step on the Career Ladder*

In addition to the need to recruit and prepare volunteers to be active partners with the staff in the achievement of program goals, there are other requirements for training volunteers. One is to enable parents and other low-income community volunteers to gain the skills and experience needed to qualify for employment.

REFERENCE	TEXT CITATION
"Head Start Child Development Programs: A Manual of Policies and Instructions." Manual 6108-1, Office of Child Development, September 1967.	3. The Staff b. Creation of Opportunities for Employing Non-Professionals (2) Development of Non-Professionals ... Non-professionals may advance to [a] position of greater responsibility.... For example, a teacher's aide may be promoted to an assistant teacher. In such cases...the 'aide' position may then be filled on a volunteer basis.
"Head Start Program Performance Standards." 45-CFR 1304, Appendix B—Head Start I-30-2, The Parents, November 1984.	B. The Role of the Parents 2. Participation in the classroom as paid employees, volunteers, or observers Participation as volunteers may also be possible for many parents. Experience obtained as a volunteer may be helpful in qualifying for non-professional employment.

5.5 *Training to Be a Volunteer Enhances Personal Growth and Development*

Another reason grantees and delegate agencies should have a thoughtfully developed volunteer training program lies in the additional opportunities it provides parent volunteers

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to acquire confidence and skills needed for their roles as parents and contributing community members. Training parent volunteers to assume program tasks or to be more effective members of decisionmaking groups can meet this requirement.

REFERENCE	TEXT CITATION
"Head Start Program Performance Standards." 45-CFR 1304, Parent Involvement, Subpart E—Parent Involvement Objectives and Performance Standards, November 1984. 1304.5-3 Parent involvement plan content: enhancing development of parenting skills	The plan shall provide methods and opportunities for involving parents in: (a) Experiences and activities which lead to enhancing the development of their skills, self-confidence, and sense of independence in fostering an environment in which their own children can develop to their full potential. *Related* Performance Standard *Guidance* (a) Parents should be encouraged to participate in Head Start policy groups.... Parents should be encouraged to participate as volunteers in social service activities making contact with community social agencies and making home visits as well as volunteering in the classrooms.

6. VOLUNTEERS IN THE EDUCATION SERVICES COMPONENT

The Education Services Plan must include the ways in which volunteers will assist in the program. Center-based programs are expected to have volunteers in the classroom; home-based programs must find ways volunteers can serve.

REFERENCE	TEXT CITATION
"Head Start Program Performance Standards." 45-CFR 1304, Education, Subpart B—Education Services Objectives and Performance Standards, November 1984. 1304.2-2 Education services plan content: operations	(a) The education services component of the performance standards plan shall provide strategies for achieving the education objectives.... *Related* Performance Standard *Guidance* (a) The plan should be accompanied by brief descriptive information regarding: • Education staff (staffing patterns, experience, training) • Volunteers • Community resources

6.1 *Volunteers in the Classroom*

Since the initiation of the first Head Start program in the summer of 1965, volunteers have been recruited for the classroom to ensure lower adult-child ratios. A

volunteer may be a parent, a college student, a retired teacher, or an interested community member.

REFERENCE	TEXT CITATION
"Head Start Child Development Programs: A Manual of Policies and Instructions." Manual 6108-1, Office of Child Development, September 1967.	3. The Staff f. The Volunteers (1) ... It is expected that the third person in the classroom will be a volunteer. Even when the grantee is able to obtain help from...[other agencies] an effort should be made to staff each classroom with a volunteer for part of the time.

6.2 *Volunteers in Home-Based Programs*

Although it is not always appropriate to use volunteers in conducting home visits, it is appropriate to ensure volunteer participation in group activities, training sessions, special events, materials preparation, and in supporting specific component area activities.

REFERENCE	TEXT CITATION
"Head Start Program Performance Standards." 45-CFR 1304, Appendix A—Program Options for Project Head Start, N-30-334, November 1984.	B. Special Provisions 4. Home-Based Models i. Volunteers As in all other Head Start programs, the home-based programs must encourage and provide opportunity for the use of volunteers.

6.3 *Volunteers as a Resource in Meeting the Special Needs of Children*

Grantees and delegate agencies must have an education program that is individualized to meet the special needs of the children. Federal regulations identify several ways that programs are to meet these needs, including having a curriculum reflective of the children's home cultures, having a bilingual adult for non-English speaking children and parents, and serving handicapped children. Volunteers can be one of the resources that programs use to meet this standard.

6.3.1 Parents as Multicultural Curriculum Resources

Head Start families come from rich and diverse cultural backgrounds. Families can share their traditions with each other by volunteering in classrooms and assisting in meeting the special needs of various populations.

REFERENCE	TEXT CITATION
"Head Start Program Performance Standards." 45-CFR 1304, Education, Subpart B—Education Services Objectives and Performance Standards, November 1984. 1304.2-2 Education services plan content: operations	(c) The education services component of the plan shall provide for a program which is individualized to meet the special needs of children from various populations by: (1) Having a curriculum which is relevant and reflective of the needs of the population served (bilingual/ bicultural, multicultural, rural, urban, reservation, migrant, etc.). (3) Including parents in curriculum development and having them serve as resource persons (e.g., for bilingual/ bicultural activities). *Related* Performance Standard *Guidance* (3) Parents can be valuable resources in planning activities which reflect the children's heritage. Teachers may request suggestions from parents on ways to integrate cultural activities into the program. For example, parents may wish to: • plan holiday celebrations; • prepare foods unique to various cultures; • recommend books, records, or other materials for the classroom; • act as classroom volunteers; • suggest games, songs, and art projects which reflect cultural customs.

6.3.2 Bilingual Volunteers

The Head Start performance standards mandate that adults be available who speak the child's language and reflect the child's cultural heritage. Volunteers often assist in filling this need.

REFERENCE	TEXT CITATION
"Head Start Program Performance Standards." 45-CFR 1304, Education, Subpart B—Education Services Objectives and Performance Standards, November 1984. 1304.2-2 Education services plan content: operations	(c) The education services component of the plan shall provide for a program which is individualized to meet the special needs of children from various populations by: (*continued*)

REFERENCE	TEXT CITATION
	(2) Having staff and program resources reflective of the racial and ethnic population of the children in the program. (i) Including persons who speak the primary language of the children and are knowledgeable about their heritage; and, at a minimum, when a majority of the children speak a language other than English, at least one teacher or aide interacting regularly with the children must speak their language.... *Related* Performance Standard *Guidance* (i) This adult may be: • a parent or family member • a volunteer who speaks the child's language

6.3.3 Serving Handicapped Children

Head Start programs are required to include handicapped children in their enrollment. At least 10 percent of the enrollees are to be professionally diagnosed as handicapped. Volunteers can support the successful mainstreaming of these children.

REFERENCE	TEXT CITATION
"Head Start Services to Handicapped Children." OCD Notice N-30-333-1-30, Office of Child Development, February 28, 1973.	B.6 Program Services d. Adult-Child Ratios Special classroom staff may be needed in some Head Start programs or centers to ensure that all children are provided an appropriate developmental experience. This might involve hiring additional staff if funds are available, obtaining help from other agencies, or utilizing volunteers.

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7. VOLUNTEERS IN THE HEALTH SERVICES COMPONENT

There are several performance standards for the health services component that either require the use of volunteers or can be met by using volunteers.

7.1 *Health Services Advisory Committee (HSAC)*

Creating the Health Services Advisory Committee (HSAC) involves the services of various health professionals and parents. The HSAC is responsible for oversight of the health services plan and operations.

REFERENCE	TEXT CITATION
"Head Start Program Performance Standards." 45-CFR 1304, Health, Subpart C—Health Services Objectives and Performance Standards, November 1984. 1304.3-2 Health Services Advisory Committee	The plan shall provide for the creation of a Health Services Advisory Committee whose purpose shall be advising in the planning, operation and evaluation of the health services program and which shall consist of Head Start parents and health services providers in the community and other specialists in the various health disciplines.... *Related* Performance Standard *Guidance* In order to achieve the comprehensive goals, the health program should be planned by professionally competent people. Planning must take place early and should involve a wide cross section of the professional health talent available in the community. The committee should be represented by all four areas of health professionals, i.e., medical, dental, mental health, and nutrition.... Involving parents, health professionals, and their organizations in planning will ensure that the health program is tailored to the needs of the children, and that it utilizes fully the resources available in the community without duplicating already existing services....

Another standard reiterates the role of the HSAC and of parents in review of the nutrition services.

REFERENCE	TEXT CITATION
"Head Start Program Performance Standards." 45-CFR 1304, Health, Subpart C—Health Services Objectives and Performance Standards, November 1984. 1304.3-10 Nutrition services	(e) The plan shall make special provision for the involvement of parents and appropriate community agencies in planning, implementing, and evaluating the nutrition services. It shall provide that: (1)The Policy Council or Committee and the Health Services Advisory Committee have opportunity to review and comment on the nutrition services.... *Related* Performance Standard *Guidance* (e) Parents should be encouraged to participate in nutrition program activities such as planning menus and working in classroom nutrition activities, to serve as volunteers or in jobs in food service and in on-going monitoring of the nutrition component....

7.2 *Volunteers and Health Services*

Programs are encouraged to obtain health examinations and services from private practitioners, public health agencies, and groups that provide special health services on a voluntary basis.

Nonprofessional volunteers and community groups may provide important support services. These include helping to arrange needed services and transportation, taking care of the child's siblings while the examination is being done, assisting with certain health screenings, and teaching the children good health practices.

REFERENCE	TEXT CITATION
"Head Start Program Performance Standards." 45-CFR 1304, Health, Subpart C—Health Services Objectives and Performance Standards, November 1984. 1304.3-4 Medical and dental treatment	(a) The plan shall provide for treatment and follow-up services which include: (1)Obtaining or arranging for treatment of all health problems detected.... *Related* Performance Standard *Guidance* (1) Head Start funds should be used only after all community resources and third party payments for which each child is eligible have been used. Only if existing services cannot be modified should new services be arranged or purchased. (*continued*)

REFERENCE	TEXT CITATION
	Every community will have available many of the resources listed in the following table. The program may contract with existing agencies to provide some or all of the health services: 1. Private Practitioners of Medicine, Dentistry, Optometry, Psychology—individual or group. 1. May provide all types of health services (consultation and planning, administrative, examinations and screening tests, treatment, immunization, health education, and continuing health supervision) on a volunteer, contract, or fee-for-service basis. 10. Special Voluntary Agencies and Public Agencies. 10. May provide funds or services for screening or treatment and rehabilitation of certain health problems....
"Head Start Program Performance Standards." 45-CFR 1304, Health, Subpart C—Health Services Objectives and Performance Standards, November 1984. 1304.3-8 Mental health services	(b) The plan shall also provide (2) Use of existing community mental health resources *Related* Performance Standard *Guidance* (2) Procedures for utilizing existing community mental health resources including specified contact persons. These procedures should be developed in conjunction with the mental health professional for identifying and contacting resources.
"Head Start Program Performance Standards." 45-CFR 1304, Health, Subpart C—Health Services Objectives and Performance Standards, November 1984. 1304.3-4 Medical and dental history, screening, and examinations	(b) Health screenings shall include: (2) Vision testing *Related* Performance Standard *Guidance* *(continued)*

REFERENCE	TEXT CITATION
	(2) When there is no established screening program and consultation from eye specialists is not available to a community, the National Society for the Prevention of Blindness or its State or local chapters, or the Volunteers for Vision, may assist in setting up a screening program.... Strabismus testing can be performed by well trained staff or volunteers. The common tests for strabismus are the Cover Test and the Hirschberg Test. Frequently, strabismus testing is performed during the physicial examination.

All staff, including volunteers, are encouraged to eat with the children in a family-style setting. Regulations stipulate that the Head Start grant may pay for volunteer meals when the meals are eaten with children in the classroom.

REFERENCE	TEXT CITATION
"Head Start Program Performance Standards." 45-CFR 1304, Health, Subpart C—Health Services Objectives and Performance Standards, November 1984. 1304.3-10 Nutrition services	(c)(6) Children and staff, including volunteers, eat together sharing the same menu and a socializing experience in a relaxed atmosphere....

7.3 *Protection of Confidentiality of Children's Health Records*

The health records of the children contain confidential information. These records must be kept in a secure location accessible only to authorized individuals.

The Health Services Plan should state the agency's policies on who may have access to the health records. Like staff, volunteers with access to personal health information must be trained in maintaining the privacy and confidentiality of this information.

REFERENCE	TEXT CITATION
"Head Start Program Performance Standards." 45-CFR 1304, Health, Subpart C—Health Services Objectives and Performance Standards, November 1984. 1304.3-5 Medical and dental records	The plan shall provide for: (a) the establishment and maintenance of individual health records which contain the child's medical and developmental history, screening results, medical and dental examination data, and evaluation of this material, and up-to-date information about treatment and follow-up.... *(continued)*

REFERENCE	TEXT CITATION
	Related Performance Standard *Guidance* In order to be useful to health workers and individual children, the health records must contain a large amount of information of a confidential nature. The privacy and confidence of this information must be respected. The records should be kept in a place that is not accessible to unauthorized persons.... A child's health record should be transferred to the school in order to ensure continuity of health services.
"Head Start Program Performance Standards." 45-CFR 1304, Health, Subpart C—Health Services Objectives and Performance Standards, November 1984. 1304.3-8 Mental health services	(b) The plan shall also provide (4) Confidentiality of records *Related* Performance Standard *Guidance* (4) Only authorized persons should be permitted to see the records. Parents and staff should jointly decide if such records are forwarded to the school system.

8. VOLUNTEERS IN THE SOCIAL SERVICES COMPONENT

Volunteers can be utilized in the social services component. A concern in using parents and other local volunteers in social services has been confidentiality. Agency policies on access to confidential information should be clearly stated and included in the Social Services Plan. (The Volunteer Plan should reference this portion of the Social Services Plan.) Parents, in their policy role, are included among those who establish policies regarding confidentiality.

These policies, in turn, should be considered in the screening, orientation, training and placement of volunteers. As with paid staff, volunteer access to confidential files should be on a need-to-know basis. This position is stated in the "HDS Position Statement on Volunteerism."

8.1 *Social Services Advisory Committee*

The performance standards suggest the creation of a committee comprising volunteers from the community, representatives of community agencies, staff, and parents. The committee provides a mechanism for fulfilling Head Start's goal of developing close cooperative linkages with existing community resources.

REFERENCE	TEXT CITATION
"Head Start Program Performance Standards." 45-CFR 1304, Social Services, Subpart D—Social Services Objectives and Performance Standards, November 1984. 1304.4-2 Social services plan content	(b) The plan shall provide for close cooperation with existing community resources including: (4) Calling attention to the inadequacies of existing community services, or to the need for additional services, and assisting in improving the available services, or bringing in new services.... *Related* Performance Standards *Guidance* (4) A Social Service Advisory Committee comprised of Head Start staff, staff from other community agencies, and Head Start parents could be formed to provide input concerning needed social services and to act as an advocacy group in obtaining these services.

8.2 *Volunteers and Client Confidentiality*

Specific training sessions should be devoted to the issues of confidentiality. Appropriately trained volunteers should be able to access those confidential materials directly related to the completion of their assigned tasks.

REFERENCE	TEXT CITATION
"HDS Position Statement on Volunteerism." HDS-IM-82-1, Office of Human Development Services, July 26, 1982.	Confidentiality: Client confidentiality need not and should not be a barrier to the use of volunteers in social services programs. Volunteers who are recruited by agencies administering publicly funded social services should be trained and supervised by agency staff. They should be expected to maintain the same standards of confidentiality, and be subject to the same prohibitions and sanctions concerning disclosure of information, as salaried employees. Under these conditions, they should be afforded access to any agency files essential to carrying out their assigned functions. Volunteer access to confidential files should be on a "need to know" basis as is true for salaried staff.

8.3 *Protection of Confidentiality of Family's Social Service Records*

As discussed above, policy requires that the Social Services Plan carefully delineate how records are to be maintained, including issues related to confidentiality. With the

Policy Council, agency staff need to develop specific guidance for volunteer access to confidential files.

REFERENCE	TEXT CITATION
"Head Start Program Performance Standards." 45-CFR 1304, Social Services, Subpart D—Social Services Objectives and Performance Standards, November 1984. 1304.4-2 Social services plan content	(c) The plan shall provide for the establishment, maintenance, and confidentiality of records of up-to-date, pertinent family data.... *Related* Performance Standard *Guidance* (c) ... Parents and staff should be involved in determining criteria for confidentiality.

8.4 *Parent Volunteers in Social Services*

Head Start parents are encouraged to participate in all aspects of the program, including social services. Parents can accompany other parents or staff to social agency visits or on home visits, where appropriate.

REFERENCE	TEXT CITATION
"Head Start Program Performance Standards." 45-CFR 1304, Parent Involvement, Subpart E—Parent Involvement Objectives and Performance Standards, November 1984. 1304.5-3 Parent involvement plan content: enhancing development of parenting skills	The plan shall provide methods and opportunities for involving parents.... *Related* Performance Standard *Guidance* (a) ... Parents should be encouraged to participate as volunteers in social service activities making contact with community social agencies and making home visits as well as volunteering in the classrooms.

9. LIABILITY COVERAGE OF VOLUNTEERS

A Head Start agency should review the adequacy of its liability insurance. This review should include the liability insurance coverage provided for volunteers. The following questions should be asked:

- Do agency volunteers have the same coverage as employees against liability for accidents to children and others while engaged in agency activities?
- Are board members and officers protected to the extent allowable by State law?
- If the agency uses nonagency owned vehicles (either those of employees or volunteers), does it maintain volunteers' excess liability insurance or social service excess auto coverage?

The costs of an adequate liability insurance program are an allowable use of Federal funds.

In addition to specific policies concerning liability insurance, insurance coverage issues are examined in ACYF-IM-85-01 "Insurance Coverage" and its attachment, the "Liability Insurance Guide for Child Care Centers," prepared by the Child Care Law Center.

REFERENCE	TEXT CITATION
"ACYF Information Memorandum on Insurance Coverage." ACYF-IM-85-01, Administration for Children, Youth and Families, February 28, 1986.	Information: Head start agencies should undertake a full review of their policies regarding insurance coverage; the kinds and amounts of coverage they require, possible additional needs, and the costs of such coverage. It is important that this review be considered an agency policy review and the outcome be a clearly defined set of agency requirements and practices with regard to all insurance needs.
"Head Start Grants Administration Regulations." 45-CFR 1301, Subchapter B—The Administration for Children, Youth and Families, Head Start Program, April 24, 1979. 1301.11 Insurance and bonding	(a) Private nonprofit Head Start agencies and their delegate agencies shall carry reasonable amounts of student accident insurance, liability insurance for accidents on their premises, and transportation liability insurance.
"HDS Position Statement on Volunteerism." HDS-IM-82-1, Office of Human Development Services, July 26, 1982.	Liability: Volunteers should be insured against liability to the same extent as regular employees who carry out similar functions. Such insurance is now available in most States at reasonable rates.
"HDS Discretionary Grants Administration Manual." TN86-1. Chapter 4. Financial Requirements	I. Insurance 2. Insurance Requirements for Head Start Grantees Liability insurance shall cover the staff and the agency for liability for accidents to children, staff, volunteers, parents and visitors on the agency's premises. There shall be reasonable transportation liability insurance covering the agency, owners, and drivers of all vehicles utilized for the provision of transportation services. Transportation liability insurance, including collision, in connection with a Head Start program, is an allowable cost....

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10. ALLOWABLE COSTS INCURRED BY VOLUNTEERS

Certain costs associated with the performance of agency services by volunteers are an allowable use of Federal funds. These include authorized travel, meals, accommodation, and child care costs. To be allowable, the kinds of costs and the conditions under which these costs may be incurred must be clearly addressed in the agency's policies and regulations. These regulations should specify when and for whom a cost is allowable; whether prior approval is needed; and the receipts, documentation, and signatures required. Records for all costs incurred by volunteers must meet auditing standards.

The regulations and procedures for payment must be carefully explained to volunteers before they become involved in program activities. Volunteers need to know whether a cost will be prepaid, reimbursed at the time (such as child care costs for Policy Council members), or at a later date. While allowable costs for out-of-town and overnight travel should be consistent with agency policies for staff, it is well to remember that many volunteers (for example, parents, students, retired persons) are not able to pay these costs themselves for later reimbursement.

REFERENCE	TEXT CITATION
"HDS Discretionary Grants Administration Manual." TN86-1. Chapter 3. Cost Principles and Procedures	D. Allowable Costs *Advisory or Policy Councils.* Costs incurred by advisory or policy councils to carry out grant programs. These costs may include travel, subsistence, and costs incidental to attending meetings. *Child Care Costs.* When authorized by the recipient's written policies, child care costs to allow authorized participants or representatives to attend official board or council meetings, subject to the limitations in program guidelines or regulations.
"HDS Position Statement On Volunteerism." HDS-IM-82-1, Office of Human Development Services, July 26, 1982.	Reimbursement of Volunteers: Although volunteers are not paid a wage for services provided, at agency option, they may be reimbursed for legitimate expenses incurred in the performance of their duties such as mileage, meals, or per diem (if overnight travel is involved). Such reimbursement should be based on established written policies of the agency and are an allowable use of Federal funds in block grant, formula grant and discretionary programs....

REFERENCE	TEXT CITATION
"Head Start Program Performance Standards." 45-CFR 1304, Appendix B—Head Start I-30-2, The Parents, November 1984.	B. The Role of the Parents 1.c Functions (3) Head Start Policy Council Members of Head Start Policy Groups whose family income falls below the "poverty line index" may receive meeting allowances or be reimbursed for travel, per diem, meal and baby sitting expenses incurred because of Policy Group meetings.

11. ALLOWABLE VOLUNTEER SERVICES FOR MATCHING REQUIREMENTS

For a Head Start grantee to count volunteer services as part of its non-Federal match of Federal funds, several conditions must be met. These are briefly noted in the subsections below with excerpts of policy statements. The overriding principle concerning valuation of volunteer services is that all cost sharing or matching must comply with Federal accounting practices. It is, therefore, imperative that all procedures for the kinds of volunteer services and the recording and valuing of these services be developed with and approved by the agency's chief fiscal officer with the concurrence of an independent auditor. In developing these procedures, the complete Federal policies on cost sharing and matching ("HDS Discretionary Grants Administration Manual," TN86-1, Attachment A, Subpart G, and OMB Circular A-122, "Cost Principles for Nonprofit Organizations," also contained in the Manual) should be used, as those sections reprinted here are, of necessity, not complete.

11.1 *Cost Sharing or Matching*

Volunteer services are those provided to the Head Start program without cost to the agency. The services provided by persons supported by other Federal funds may not be used to meet Federal matching requirements. Many State programs are supported all or in part by Federal funds. The agency has to determine whether services from such sources meet Federal regulations for matching funds.

Volunteer services may be counted as part of the matching requirement for one, and only one, Federal grant.

REFERENCE	TEXT CITATION
"HDS Discretionary Grants Administration Manual." TN86-1, Attachment A—Administration of Grants. Federal Regulations, Title 45, Part 74, Subpart G, Cost Sharing or Matching. 74.51 Definitions	Third-party in-kind contributions means property or services which benefit a grant-supported project or program and which are contributed by non-Federal third parties without charge to the grantee, the subgrantee or a cost-type contractor under the grant or subgrant.
"HDS Discretionary Grants Administration Manual." TN86-1, Attachment A—Administration of Grants. Federal Regulations, Title 45, Part 74, Subpart G, Cost Sharing or Matching 74.53 Qualifications and exceptions	(b) *Costs or contributions counted toward other Federal cost-sharing requirements* Neither costs nor the values of the third-party in-kind contribution may count towards satisfying a cost-sharing or matching requirement of an HHS grant if they have been counted towards satisfying a cost-sharing or matching requirement of another Federal grant, a Federal procurement contract, or any other award of Federal funds.
"HDS Discretionary Grants Administration Manual." TN86-1. Chapter 3. Cost Principles and Procedures	E. Unallowable Costs Federal funds generally may not be used for...[unallowable costs] nor may such costs be used to meet cost-sharing or matching requirements. Recipients should consult the appropriate cost principles for specific guidance on allowable/unallowable costs.
"HDS Discretionary Grants Administration Manual." TN86-1, Attachment A—Administration of Grants. Federal Regulations, Title 45, Part 74, Subpart G, Cost Sharing or Matching 74.53 Qualifications and exceptions	(e) *Special standards for third-party in-kind contributions* (1) Third-party in-kind contributions shall count towards satisfying a cost-sharing or matching requirement only where, if the party receiving the contributions were to pay for them, the payments would be allowable costs.

11.2 *Services Provided Within Grant Period*

Only those volunteer services provided during the Federal grant period may be counted as part of the match for the Federal funds.

REFERENCE	TEXT CITATION
"HDS Discretionary Grants Administration Manual." TN86-1, Attachment A—Administration of Grants. Federal Regulations, Title 45, Part 74, Subpart G, Cost Sharing or Matching 74.52 Basic rule: Costs and contributions acceptable	With the qualifications and exceptions listed in 74.53, a cost-sharing or matching requirement may be satisfied by either or both of the following: (a) Allowable costs... (b) The value of third-party in-kind contributions applicable to the period to which the cost-sharing or matching requirement applies.

11.3 *Services Provided from Outside Agency (Accounting Technicality)*

For accounting purposes, a distinction is made between volunteer services provided by persons separate from the agency and staff time donated to the Head Start program by the agency.

REFERENCE	TEXT CITATION
"HDS Discretionary Grants Administration Manual." TN86-1. Chapter 2. Cost Sharing or Matching	D. Valuation of Third-Party In-Kind Contributions 1. Volunteer Services Volunteer services are services which are not paid for by the recipient or cost-type contractor vis-a-vis the paid services a recipient may use to meet a cost-sharing or matching requirement. Volunteer services may be furnished by professional and technical personnel, consultants, and other skilled and unskilled persons....

11.4 *Services as an Indirect Cost*

If the agency applies an indirect cost rate, it will be necessary to determine whether the volunteer service, if paid for, would be an indirect cost.

REFERENCE	TEXT CITATION
"HDS Discretionary Grants Administration Manual." TN86-1, Attachment A—Administration of Grants. Federal Regulations, Title 45, Part 74, Subpart G, Cost Sharing or Matching 74.53 Qualifications and exceptions	(e) *Special standards for third-party in-kind contributions* (2) A third-party in-kind contribution shall not count as direct cost sharing or matching where, if the party receiving the contributions were to pay for it, the payment would be an indirect cost....

12. VALUATION OF VOLUNTEER SERVICES

To count volunteer services as part of its non-Federal match, an agency must first assign values to the volunteer services. These valuations must be consistent with agency personnel policies and with community standards. They must also be approved by the agency's chief fiscal officer and its independent auditor.

12.1 *Establishment of Wage Comparability Rates*

Wage comparability rates must be established for the volunteer hours of each category of volunteer. These rates for volunteer services should be in line with agency and community salary scales. For example, the hourly rate of a volunteer aide would have a value comparable to that of paid classroom aides; the rate for the volunteer services of a health professional would be comparable to the going community rate for such services.

In addition to the hourly rate, fringe benefits may be included as part of the valuation of unpaid volunteer services under certain conditions.

REFERENCE	TEXT CITATION
"HDS Discretionary Grants Administration Manual." TN86-1, Attachment C—Cost Principles for Nonprofit Organizations, OMB Circular A-122.	Attachment B. Selected Items of Costs 10. Donations a. Services received (5) The value of the donated services may be used to meet cost sharing or matching requirements under conditions described in Attachment E, OMB Circular No. A-110.... (6) Fair market value of donated services shall be computed as follows: (a) Rates for Volunteer Services. Rates for volunteers shall be consistent with those regular rates paid for similar work in other activities of the organization. In cases where the kinds of skills involved are not found in the other activities of the organization, the rates used shall be consistent with those paid for similar work in the labor market in which the organization competes for such skills.
"HDS Discretionary Grants Administration Manual." TN86-1, Attachment A—Administration of Grants. Federal Regulations, Title 45, Part 74, Subpart G, Cost Sharing or Matching. 74.54 Valuation of donated services	(a) *Volunteer Services* Unpaid services provided to a recipient by individuals shall be valued at rates consistent with those ordinarily paid for similar work in the recipient's organization. *(continued)*

REFERENCE	TEXT CITATION
	If the recipient does not have employees performing similar work, the rates shall be consistent with those ordinarily paid by other employers for similar work in the same labor market. In either case, a reasonable amount for fringe benefits may be included in the valuation.

12.2 *Services from Employees of Another Employer*

In placing a value on volunteer services, a distinction is made by HDS between the unpaid volunteer services discussed above and the services of a person paid for and donated by his or her employer. In the latter case, fringe benefits may not be included, and the value of services is the wage paid by the employer.

REFERENCE	TEXT CITATION
"HDS Discretionary Grants Administration Manual." TN86-1, Attachment A—Administration of Grants. Federal Regulations, Title 45, Part 74, Subpart G, Cost Sharing or Matching. 74.54 Valuation of donated services	(b) *Employees of Other Organizations* When an employer other than a recipient or cost-type contractor furnishes free of charge the services of an employee in the employee's normal line of work, the services shall be valued at the employee's regular rate of pay exclusive of the employer's fringe benefits and overhead costs. If the services are in a different line of work, paragraph (a) of this section shall apply [see Section 12.1, second reference (a) *Volunteer Services*].

12.3 *Services by Volunteer Decisionmakers*

An assessment must also be made of the value to the agency of the time spent by board and Policy Council members and by members of advisory and evaluation groups.

REFERENCE	TEXT CITATION
"HDS Discretionary Grants Administration Manual." TN86-1. Chapter 2. Cost Sharing or Matching	D. Valuation of Third-Party In-Kind Contributions 1. Volunteer Services ... Each hour of volunteer service may be counted if the service is an integral and necessary part of an approved project.... (*continued*)

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REFERENCE	TEXT CITATION
	Examples of volunteer services which may be counted as third-party in-kind contribution include: The reasonable value of time donated by Head Start community members, Board, Policy Council, and parents in conducting the Performance Standards Self-Assessment and/or attending business meetings.

13. DOCUMENTATION OF VOLUNTEER SERVICES

An agency that plans to include the value of volunteer services as part of its non-Federal match must first put in place a system for documenting those services. This documentation begins with the form signed by both the volunteer and his or her supervisor recording the date, hours, and kind of service provided. This includes the assignment of the appropriate rate from the agency's scale of volunteer rates, the calculation of the cash value of the volunteer service, and the entrance of this amount into the agency's system of accounts. Staff will have to be trained in the system and responsibility assigned for maintaining subparts of the system and for oversight of the whole.

Because documentation of volunteer services must meet Federal Audit Standards, the agency's chief fiscal officer and the personnel manager should be included among those who develop and/or approve the system for recording volunteer services.

Records of volunteer services are subject to the same retention requirements as other fiscal records of Federal grant funds.

REFERENCE	TEXT CITATION
"Head Start Child Development Programs: A Manual of Policies and Instructions." Manual 6108-1, Office of Child Development, September 1967.	3. f. Volunteers (1) ... to take credit for non-Federal share for volunteers, time records must be kept, signed by the Director of the Center, indicating when the volunteer arrived and departed.

REFERENCE	TEXT CITATION
"HDS Discretionary Grants Administration Manual." TN86-1. Chapter 2. Cost Sharing or Matching	F. Records of Cost-Sharing or Matching Contributions 45-CFR 74.53(d) provides the requirements for records of cost-sharing or matching contributions. Records of cost-sharing or matching contributions are subject to audit in the same manner and to the same extent as records dealing with the use of Federal grant funds.
"HDS Discretionary Grants Administration Manual." TN86-1, Attachment A—Administration of Grants. Federal Regulations, Title 45, Part 74, Subpart G, Cost Sharing or Matching. 74.53 Qualifications and exceptions	(d) *Records* Costs and third-party in-kind contributions counting towards satisfying a cost-sharing or matching requirement must be verifiable from the records of recipients.... These records must show how the value placed on third-party in-kind contributions was arrived at. To the extent feasible, volunteer services shall be supported by the same methods that the organization uses to support the allocability of its regular personnel costs.